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14 Attorneys for PLAINTIFF  
15 ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ROBERT HUNTER BIDEN, an  
19 individual,

20 Plaintiff,

21 vs.

22 PATRICK M. BYRNE, an individual,

23 Defendant.  
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**Case No. 2:23-cv-09430-SVW-PD**

*Hon. Stephen V. Wilson*

**DECLARATION OF PAUL B.  
SALVATY IN SUPPORT OF JOINT  
REQUEST FOR REMOTE INITIAL  
STATUS CONFERENCE**

Date: March 18, 2024  
Time: 3:00 P.M.  
Place: Courtroom 10A

**DECLARATION OF PAUL B. SALVATY**

I, Paul B. Salvaty, declare as follows:

1. I am an attorney at law licensed to practice before all courts in the State of California and am the attorney of record for Mr. Robert Hunter Biden. I have personal knowledge of the matters contained in this declaration and, if called as a witness to testify, I could and would competently testify to them.

2. I am a partner at Winston & Strawn LLP, located at 333 South Grand Avenue, Los Angeles CA 90071.

4. On February 15, 2024, Plaintiff Robert Hunter Biden and Defendant Patrick M. Byrne (the “Parties”) received the Court’s Order setting the initial status conference for March 18, 2024 at 3:00 PM before the Honorable Stephen V. Wilson in Courtroom 10A. The order also stated that “[t]he attorneys attending this conference MUST be those who are in charge of the conduct of the trial. Attendance is mandatory.”

5. Lead counsel for Mr. Biden, Abbe Lowell, who will be in charge of the conduct of the trial, is based in Washington, D.C. and has a scheduling conflict on March 18, 2024, due to the fact that he teaches a class on Monday afternoons at Georgetown Law School in Washington, D.C., from 3:30 PM to 5:30 PM Eastern Time.

6. On February 23, 2024, I conferred with Nabil Abu-Assal, counsel for Defendant, about this scheduling conflict and about Plaintiff’s intention to request permission that Mr. Lowell be permitted to appear virtually at the initial status conference. Mr. Abu-Assal informed me that Michael Smith, who will be in charge of the conduct of the trial, resides in Michigan and currently has appearances scheduled in other matters on March 18, 2024. Mr. Abu-Assal informed me that he also is unavailable to appear in person on March 18, 2024, as he will be in Chicago, Illinois for a previously-arranged business trip.

7. Based on the foregoing conversation, the Parties agreed to submit this joint

1 request that the initial status conference be conducted via Zoom so that all counsel in  
2 charge of the conduct of the trial are permitted to appear virtually.

3 8. Counsel have met and conferred with respect to the topics to be addressed in  
4 their F.R.C.P. Rule 26(f) report, and they will be submitting their F.R.C.P. 26(f) report  
5 no later than March 11, 2024, as required by F.R.C.P. 26(f)(2) and Central District  
6 Local Rule 26-1.

7 I declare under penalty of perjury under the laws of the State of California that  
8 the foregoing is true and correct.

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10 Executed on this 6th day of March, 2024 in Los Angeles, California.

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13 /s/ Paul B. Salvaty  
14 Paul B. Salvaty  
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